

December 1, 2023

VIA ECF

Honorable Vernon S. Broderick United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 12/04/2023

Re: United States v. Zukeila Plaza, 1:22-cr-00142-VSB

Dear Judge Broderick:

We write pursuant to Rule 21 of the Court's Electronic Case Filing Rules and Instructions ("ECF Rules") and Rule 10(E) of Your Honor's Individual Rules & Practices in Criminal Cases to respectfully request that the Court redact information beyond the eleven categories of information identified in the ECF Rules. The requested redactions and explanations are provided in the table below. Thank you for your consideration.

Requested Redaction	Explanation
Sentencing Memorandum, bottom of page 3 and middle of page 6	Confidential information produced in discovery
Sentencing Memorandum, bottom of pages 4 and 6	Sensitive information about childhood trauma
Sentencing Memorandum, page 7	References to the PSR, which is not available to the public
Sentencing Memorandum, middle of page 5, bottom of page 6, bottom of page 8, top of page 9	References to the Treatment Summary, which is not available to the public



Exhibit L	Sensitive photographs depicting injuries

Respectfully submitted,

/s/ John T. Zach John T. Zach Waleska Suero Garcia

Attorneys for Zukeila Plaza